

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**GEORGIA-PACIFIC CONSUMER PRODUCTS,
LP,**

07 Civ. 9627 (SHS)

Plaintiff,

-against-

INTERNATIONAL PAPER COMPANY,

Defendant.

**DECLARATION OF INGO W. SPRIE, JR. IN OPPOSITION TO
DEFENDANT'S RULE 56(f) REQUEST FOR DISCOVERY AND IN
FURTHER SUPPORT OF PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

Ingo W. Sprie, Jr. hereby declares under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a member of the Bar of this Court and of the law firm of Arnold & Porter LLP, counsel for plaintiff Georgia-Pacific Consumer Products, LP ("Georgia-Pacific").
2. I make this declaration in opposition to defendant's request for discovery pursuant to Federal Rule Of Civil Procedure 56(f) and in further support of plaintiff's motion for summary judgment.
3. Attached hereto as Exhibit A is a true and correct copy of a letter from Joseph Serino, Jr. to the Honorable Sidney H. Stein, dated December 18, 2007.
4. Attached hereto as Exhibit B is a true and correct copy of a letter from Ingo W. Sprie, Jr. to the Honorable Sidney H. Stein, dated December 20, 2007.
5. Attached hereto as Exhibit C is a true and correct copy of a letter from Joseph Serino, Jr. to the Honorable Sidney H. Stein, dated December 20, 2007.

6. Attached hereto as Exhibit D is a true and correct copy of a letter from Ingo W. Sprie, Jr. to the Honorable Sidney H. Stein, dated December 21, 2007.

7. Attached hereto as Exhibit E is a true and correct copy of a Stipulation And Order that was "so ordered" on January 7, 2008.

8. Attached as Exhibit F is a true and correct copy of a letter from Sarah P. Flanagan (EPA Assistant Regional Counsel) to Brian Heim (International Paper Senior Counsel, Environmental Health and Safety), dated December 31, 2007 attaching the Unilateral Administrative Order For Removal Action, And Remedial Investigation/Feasibility Study.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 29, 2008



Ingo W. Sprie, Jr.